

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI

JUSTIN LAYTON,)	
)	
Plaintiff,)	
)	
vs.)	Case No.: 4:22-CV-00202-SRB
)	
CITY OF INDEPENDENCE, MISSOURI, et al.,)	
)	
Defendants.)	

JOINT PROPOSED SCHEDULING ORDER

COME NOW the parties, consistent with the Court's March 31, 2022, Order (Doc. No. 4), and propose the following Scheduling Order.

1. On April 8, 2022, information was exchanged between Benjamin Stelter-Embry (counsel for Plaintiff) and David S. Baker (counsel for Defendants). As a result, the parties have agreed, subject to the approval of the Court, to the following Joint Proposed Scheduling Order.

2. By June 27, 2022, the parties shall provide each other with the information required by Fed. R. Civ. P. 26(a)(1).

3. The parties have agreed and recommend to the Court the following proposed Rule 16 Scheduling Order:

a. The proposed closing date for the joinder of parties shall be October 20, 2022. This date has been proposed because it will allow the parties sufficient time to engage in preliminary discovery to determine whether the addition of other parties is appropriate.

b. Any motion to amend the pleadings to add claims shall be filed on or before October 20, 2022. This date has been proposed because it will allow the parties sufficient time to engage in preliminary discovery to determine whether additional claims are appropriate.

c. The parties propose all discovery motions be filed on or before March 24, 2023.

d. The parties propose dispositive motions be filed no later than April 21, 2023.

e. All other pretrial motions shall be filed no later than 15 days prior to the proposed date the case is set for trial by the Court.

f. The parties propose all pretrial discovery be completed on or before March 24, 2023.

4. The parties have agreed and recommend to the Court the following proposed scheduling regarding identification and depositions of expert witnesses:

a. The parties propose Plaintiff identify his expert witnesses and provide the information required by Fed. R. Civ. P. 26 on or before December 22, 2022.

b. The parties propose Defendants identify their expert witnesses and provide the information required by Fed. R. Civ. P. 26 on or before February 7, 2022.

5. The parties do not anticipate there may be discovery with regard to electronically stored information.

6. The parties anticipate this case will take approximately three to four (3-4) days to try.

7. The parties propose it would be appropriate to set this case for trial at some point after September 11, 2023.

8. The parties anticipate it may be appropriate to seek issuance of a Protective Order with regard to anticipated discovery in the areas of personnel files; training records; medical and mental healthcare records; and internal policies, procedures, and security measures of governmental and law enforcement agencies. In accordance with Local Rule 16.1(f)(7), any party who anticipates requesting a protective order shall serve on each other party a proposed protective order and proposed stipulation for its entry before it is submitted to the Court for consideration.

9. The parties have demanded a trial by jury.

Respectfully submitted,

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